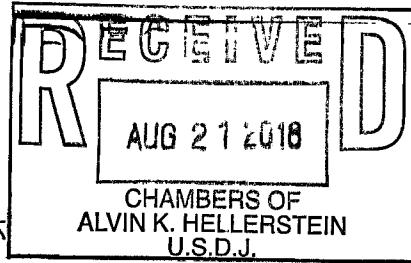




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August 21, 2018

**VIA ECF & FACSIMILE (212-805-7942)**

Hon. Alvin K. Hellerstein  
United States Courthouse, S.D.N.Y.  
500 Pearl Street, Room 1050  
New York, New York 10007

Re: *Global Merchandising Services Ltd. v. Sunfrog, LLC* (Civil Action No. 1:17-cv-10154-AKH), **Letter Motion Requesting Extension of Time and Adjournment of Initial Pretrial Conference**

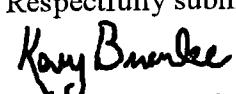
Dear Judge Hellerstein:

We represent Plaintiff Global Merchandising Services Ltd. ("Plaintiff" or "GMS") in the above-referenced action. We are writing to respectfully request an extension of Plaintiff's time to file an amended complaint, as well as an adjournment of the initial case management conference ("Initial Conference").

Per Your Honor's Order Granting in Part and Denying in Part Defendant's Motion to Dismiss (Docket Entry No. 22), Plaintiff's deadline to file an amended complaint is this Friday, August 24, 2018, with Defendant's answer due by September 13, 2018. The Initial Conference is scheduled before Your Honor on September 21, 2018 at 10 AM. The parties are currently engaged in discussions regarding a potential amicable resolution of this matter. In order to facilitate further negotiations, and to conserve the time and resources of the parties, as well as the Court, Plaintiff requests a thirty (30) day extension of its time to file an amended pleading until September 24, 2018, with Defendant's answer due on or before October 15, 2018, and an adjournment of the Initial Conference until October 22, 2018 or the next available date on the Court's calendar. This is Plaintiff's first request for an extension of time to file an amended complaint<sup>1</sup>, and first request for any adjournment. Defendant's counsel has indicated that Defendant will not oppose the requests set forth herein.

A Proposed Order reflecting the above is attached. We thank the Court for its time and consideration.

USDC SDNY
<b>DOCUMENT</b>
<b>ELECTRONICALLY FILED</b>
DOC #: _____
DATE FILED: _____

Respectfully submitted,  
  
 Kerry B. Brownlee

<sup>1</sup> Defendant previously requested an extension of time to respond to Plaintiff's original Complaint (Docket Entry No. 12), which was granted by the Court (Docket Entry No. 13).